

EXHIBIT E

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Sean Bennett, an individual,
Plaintiff,

vs.

City of Phoenix, a governmental entity;
American Airlines, Inc., a foreign
corporation; Officer Joel Cottrell and Jane
Doe Cottrell, a married couple; Officer
Benjamin Denham and Jane Doe Benham,
a married couple; Officer Todd Blanc and
Jane Doe Blanc, a married couple; Officer
Peru and Jane Doe Peru, a married couple;
Sergeant Hogan and Jane Doe Hogan, a
married couple,

Defendants.

No.: CV-23-02425-PHX-ROS (DMF)

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S FIRST SET OF
INTERROGATORIES**

(Assigned to the Honorable Roslyn O.
Silver and referred to the Honorable
Deborah M. Fine for all pretrial
proceedings)

Through counsel undersigned and pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Sean Bennett ("Plaintiff") hereby responds to "Defendant American Airlines, Inc.'s [{"Defendant's"}] Interrogatories [{"ROGs"}] to [Him] (Set One)" as follows (as used herein, the word "Complaint" means the operative complaint in this action, the term "Plaintiff's First Supplemental Disclosure Statement" means the latest disclosure statement served by Plaintiff in this action, and the term "BENNETT 1-88" means all documents produced by Plaintiff to date in this action):

1 **ROG 1: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
2 **owed “a duty to exercise ordinary care for the safety and well-being of [YOU].”**

3 **Response:** Objection. This is overbroad and requires a legal conclusion. Subject to these
4 objections, under negligence theories, a business that invites customers to utilize their
5 services owes a duty of care to ensure safety of their customers. Business are liable for the
6 actions of their employees under *respondeat superior*. By American Airlines’ employees
7 undertaking reckless actions that are indifferent to the safety of an individual, a business is
8 responsible for violations of that duty. Furthermore, the Complaint in this matter lays out
9 the theory of the duty owed by American Airlines and the theory of how American Airlines
10 via its employees violated that duty. Police confirmed that American Airlines employees
11 called for police to “step it up” and that the police were not happy after the fact that
12 American Airlines did so. Additionally, American Airlines employees provided no
13 statements to the police despite their histrionics over the radio. *See* Complaint and
14 BENNETT_00015-16, *Demand Letter* BENNETT_00048-57 which are hereby
15 incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement
16 these responses and his disclosure statements as discovery is ongoing and additional
17 information may come to light.
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23 **ROG 2: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
24 **“breached that duty systematically and repeatedly.”**

25 **Response:** *See* Response to ROG 1. Additionally, because American Airlines employees
26 started the incident by their callous contact with Plaintiff and their demand that he move
27 seats, and their extreme escalation to forcing Plaintiff off the plane for a simple
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misunderstanding, and their histrionics over the radio to “step it up”, Plaintiff endured significant injuries emotionally, mentally, and physically causing him to need treatment as well as endure time away from his family as he was stuck figuring out how to fly out of Alaska following this incident. Plaintiff reserves the right to supplement these responses and his disclosure statements as discovery is ongoing and additional information may come to light.

ROG 3: State all facts in support of YOUR allegation that employees of AMERICAN AIRLINES falsely reported to police dispatchers that YOU were “physically fighting onboard, and close to, the airplane.”

Response: Objection. Overbroad and already stated in Plaintiff’s Complaint and demand letters to American Airlines. Plaintiff recalls peacefully exiting the airplane, recalls no physical contact. Furthermore, the police report in this matter states that police were told that Plaintiff was physically fighting on the plane. From the police report in this matter:

THE FOLLOWING IS A CONDENSED SUMMARY OF THE 3 CALLS OF COMMUNICATIONS RECORDED BY AMERICAN AIRLINES RELATED TO THIS CALL:

CALL #1

PILOT TO DISPATCHER HEATHER - "WE'VE GOT A COMBATIVE PASSENGER ON BOARD WE NEED POLICE DOWN HER A.S.A.P." ...HEATHER TO AVIATION POLICE DISPATCH - "ON BOARD THE AIRCRAFT, I'LL NEED LEO'S, I HAVE A MALE PASSENGER BEING COMBATIVE WITH FLIGHT CREW."

...

1 REPLY "IS THE AIRCRAFT THERE AT THE GATE?" REPLY ANSWER "YES
2 IT IS." REPLY QUESTION "WHEN YOU SAY COMBATIVE IS HE PHYSICALLY
3 FIGHTING?" REPLY ANSWER **"THAT'S MY UNDERSTANDING, YES."**

4
5 CALL #2

6 TOWER GATE DISPATCHER KRIS TO GATE A20 AMERICAN AIRLINES
7 MANAGER JEFF - JEFF STATES "SOMEONE JUST BUSTED OUT THROUGH THE
8 DOOR (JETWAY BRIDGE FROM PLANE TO CONCOURSE SECURITY DOOR) ...
9 CAN YOU GET ME LEO'S BECAUSE I GOT SOME GUY THAT IS VERY
10 AGITATED." ...

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12 "LEO'S. I GOTTA GET IN FRONT OF SOMONE. O.K." REPLY FROM KRIS
13 "LEO'S TO ALPHA 20. COPY THAT. GOOD BYE."

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15 CALL #3

16 TOWER GATE DISPATCHER HEATHER TO AVIATION POLICE DISPATCH
17 - HEATHER STATES "THIS IS HEATHER ... REGARDING GATE ALPHA 20 AND
18 A COMBATIVE PASSENGER WHO IS CURRENTLY OFF THE AIRCRAFT AND IN
19 THE JETWAY" RESPONSE "ARE THEY STILL FIGHTING?" RESPONSE "UM, I'M
20 NOT SURE ABOUT THAT. THAT WAS JUST AN (INSA?) UPDATE FROM THE
21 PILOT AND SO ONCE HE WAS OFF THEY CLOSED THE DOOR. BUT I'M TRYING
22 TO GET. HOLD ON ONE SECOND (HEATHER IS TALKING TO SOMEONE ELSE
23 IN THE BACKGROUND) YEAH, YEAH, IS, HOLD ON A SECOND." HEATHER
24 TALKING TO ANOTHER FEMALE WHO ASKS "STATUS IS HE IS IN THE
25 JETWAY. IS HE STILL BEING COMBATIVE?" HEATHER REPLIES TO HER "YES,
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1 HE IS STILL BEING COMBATIVE." HEATHER TO AVIATION POLICE DISPATCH
 2 "OUTBOUND FLIGHT NUMBER IS 2391." ... "AND THEY DO HAVE HIM AT THE
 3 PODIUM NOW, THE GATE PODIUM, AND THEY, PLEASE, THEY SAY PLEASE
 4 GET LEO'S THERE A.S.A.P." CAN NOW HEAR MALE AVIATION POLICE
 5 DISPATCHER SAYING QUIETLY TO SOMEONE OR TALKING TO SELF WHILE
 6 TYPING "REQUEST STATUS, REQUEST TO STEP UP." ... HE SAYS "PERFECT.
 7 O.K. WE'LL GO AHEAD AND UPDATE WE'LL LET THE OFFICERS KNOW THAT
 8 THEY NEED TO RESPOND A LITTLE BIT QUICKER." SHE SAYS "YES, PLEASE."
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 12 *See also Complaint and BENNETT_00015-16, Demand Letter BENNETT_00048-57, and*
 13 *BENNETT_000098-BENNETT_000109 - POLICE REPORT, BENNETT_000132-147,*
 14 *which are hereby incorporated by reference as if fully stated herein. Plaintiff reserves the*
 15 *right to supplement these responses and his disclosure statements as discovery is ongoing*
 16 *and additional information may come to light.*
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20 **ROG 4: State all facts in support of YOUR allegation that employees of AMERICAN**
 21 **AIRLINES caused YOU “to be added to the ‘no fly list’ without justification.”**

22 **Response:** All partner flights with American and Alaska were immediately canceled.
 23 Alaska said no. Plaintiff attempted to contact federal agencies to determine this. One such
 24 agency was the Department of Homeland Security. Plaintiff was told that he would need
 25 to attempt a flight to find out. Plaintiff contacted multiple Federal members of the
 26 legislature and three members of the State legislature in Alaska, Tennessee, and he recalls
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Oklahoma. He had to work alone to make these contacts which took an extended period of time. *See* Complaint and BENNETT_000058-60, 70-81, 121-122, 129-147 which are hereby incorporated by reference as if fully stated herein.

ROG 5: State all facts in support of YOUR allegation that employees of AMERICAN AIRLINES “press[ed] charges against [YOU] for [YOUR] conduct on the plane without justification.”

Response: This speaks for itself. Charges were pressed against Plaintiff. *See* Complaint, BENNETT_00089-97 (municipal court case), and BENNETT_000098-BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement these responses and his disclosure statements as discovery is ongoing and additional information may come to light.

ROG 6: IDENTIFY all witnesses with personal knowledge of facts YOU contend will support YOUR negligence/gross negligence claim against AMERICAN AIRLINES (including the scope of each witness’s knowledge).

Response: *See* Plaintiff’s First and Second Supplemental Disclosure Statements, which are hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement those disclosure statements as discovery is ongoing and additional witnesses may come to light.

ROG 7: IDENTIFY in detail all “physical, financial, and other damages” YOU allege were “a direct and proximate result of [American Airlines’] breach.”

1 **Response:** Objection, Discovery is ongoing, and Plaintiff is working to retrieve medical
2 records and billing. Plaintiff suffered gunshot wounds in Iraq in 2007. *See*
3 *BENNETT_000116* which were exacerbated by this incident. Additionally and currently,
4
5 See also Plaintiff's First and Second Supplemental Disclosure Statements and *See*
6 Complaint, which are hereby incorporated by reference as if fully stated herein. *See*
7 *BENNETT_000115*, 123, 125-126, 148. Plaintiff reserves the right to supplement these
8 responses and his disclosure statements as discovery is ongoing and additional information
9 may come to light.
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12 **ROG 8:** State all facts in support of YOUR allegation that American Airlines' "acts
13 and omissions ... demonstrate gross and wanton negligence."
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15 **Response:** Objection, this is overbroad, and Plaintiff has delineated these actions in
16 demand letters and the Complaint. This ROG is also duplicative of ROGS 2 and 3. Subject
17 to those objections, none of American Airlines employees' actions were reasonable. *See*
18 Answers to ROGS 2-3, *See* Complaint, which are hereby incorporated by reference as if
19 fully stated herein. Plaintiff reserves the right to supplement these responses and his
20 disclosure statements as discovery is ongoing and additional information may come to
21 light.
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25 **ROG 9:** State all facts in support of YOUR allegation that AMERICAN AIRLINES
26 "knew or had reason to know that [its] acts individually and collectively created an
27 unreasonable risk of bodily harm to [YOU], and a high probability that substantial
28 harm to [YOU] would result."

Response: Objection. This ROG seeks information that needs to be disclosed by Defendants or has already been disclosed. Subject to that objection, see answers to ROGS 2-3, *See Complaint and BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby incorporated by reference as if fully stated herein.* Plaintiff reserves the right to supplement these responses and his disclosure statements as discovery is ongoing and additional information may come to light.

ROG 10: State all facts in support of YOUR allegation that employees of AMERICAN AIRLINES” acted intentionally and recklessly to cause [YOU] to apprehend an immediate harmful or offensive contact, and [YOU] did in fact apprehend such contact.”

Response: Objection. This is overly burdensome and duplicative. This ROG seeks information that has already been disclosed. Subject to that objection, *See answers to ROGS 2-3, See Complaint and BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby incorporated by reference as if fully stated herein.* Plaintiff reserves the right to supplement these responses and his disclosure statements as discovery is ongoing and additional information may come to light.

ROG 11: IDENTIFY in detail all damages YOU allege were incurred “as a direct and proximate result of [YOUR] apprehension.”

Response: Objection, Discovery is ongoing and Plaintiff is working to retrieve medical records and billing. *See* Complaint, and Plaintiff's First Supplemental Disclosure Statement, which are hereby incorporated by reference as if fully stated herein. Objection. This ROG seeks information that has already been disclosed. Subject to that objection, *See* answers to ROGS 2-3, ROG 7, *See* Complaint and BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-BENNETT_000109 - POLICE REPORT, BENNETT_000132-147 which are hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement these responses and those disclosure statements as discovery is ongoing and additional information may come to light.

ROG 12: IDENTIFY all witnesses with personal knowledge of facts YOU contend will support YOUR assault claim against AMERICAN AIRLINES (including the scope of each witness's knowledge).

Response: *See* Plaintiff's First Supplemental Disclosure Statement, which is hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement these responses and his disclosure statements as discovery is ongoing and additional information may come to light.

ROG 13: State all facts in support of YOUR allegation that employees of AMERICAN AIRLINES "intentionally and/or recklessly engaged in acts that resulted in harmful or offensive contact to [YOU]."

Response: Objection. This is duplicative of multiple ROGS including ROG 2-3, 6, 8-10. *See* Complaint and Disclosure statements produced in this case, which are hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement

1 these responses and his disclosure statements as discovery is ongoing and additional
 2 information may come to light.

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 5 **ROG 14: IDENTIFY all witnesses with personal knowledge of facts YOU contend will**
 6 **support YOUR battery claim against AMERICAN AIRLINES (including the scope**
 7 **of each witness's knowledge).**

8 **Response:** *See* Plaintiff's First and Second Supplemental Disclosure Statement, which is
 9 hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to
 10 supplement these responses and his disclosure statements as discovery is ongoing and
 11 additional information may come to light.

12 **ROG 15: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
 13 **"intentionally instigated and/or participated in the unlawful restraint of [YOU] by**
 14 **[its] words and acts."**

15 **Response:** Objection. This is duplicative of previous ROGS including ROG 2-3, 6, 8-10,
 16 12-13, Plaintiff's First and Second Supplemental Disclosure Statements, *See* Complaint,
 17 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
 18 BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby
 19 incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement
 20 these responses and his disclosure statements as discovery is ongoing and additional
 21 information may come to light.

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 25 **ROG 16: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
 26 **"directed, requested, invited or encouraged the act of false imprisonment."**

27 **Response:** Objection. This is duplicative of previous ROGS including ROG 2-3, 6, 8-10,
 28 12-13, 15, Plaintiff's First and Second Supplemental Disclosure Statements, *See*

1 Complaint, BENNETT_00015-16, Demand Letter BENNETT_00048-57, and
2 BENNETT_000098-BENNETT_000109 - POLICE REPORT, BENNETT_000132-147
3 which are hereby incorporated by reference as if fully stated herein. Plaintiff reserves the
4 right to supplement these responses and his disclosure statements as discovery is ongoing
5 and additional information may come to light.
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7 **ROG 17: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
8 **“participated in the act of false imprisonment by aiding COP and the Officer**
9 **Defendants in restraining [YOU].”**

10 **Response:** Objection. This is duplicative of previous ROGS including ROG 2-3, 6, 8-10,
11 12-13, Plaintiff’s First and Second Supplemental Disclosure Statements, See Complaint,
12 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
13 BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby
14 incorporated by reference as if fully stated herein.
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16 Subject to those objections, Plaintiff contends that American Airlines and its
17 employees cajoled and falsely reported to police that Plaintiff’s actions were anything
18 wrong – including that Plaintiff was physically fighting. Because of this, and through the
19 extension of the COP and police officers’ actions, Plaintiff was physically injured.
20 American Airlines and its employees’ actions were part and parcel to the attack. Plaintiff
21 reserves the right to supplement these responses and his disclosure statements as discovery
22 is ongoing and additional information may come to light
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1 **ROG 18: IDENTIFY in detail all damages YOU sustained as “a direct and proximate**
2 **result” AMERICAN AIRLINES alleged “participation in false arrest and**
3 **imprisonment.”**
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5 **Response:** Objection, this is again a duplicative ROG. Discovery is ongoing and Plaintiff
6 is working to retrieve medical records and billing. See Complaint, and Plaintiff’s First
7 Supplemental Disclosure Statement, which are hereby incorporated by reference as if fully
8 stated herein. Objection. This ROG seeks information that has already been disclosed.
9 Subject to that objection, See answers to ROGS 2-3, ROG 7, See Complaint and
10 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
11 BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby
12 incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement
13 these responses and those disclosure statements as discovery is ongoing and additional
14 information may come to light.
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19 **ROG 19: IDENTIFY all witnesses with personal knowledge of facts YOU contend will**
20 **support YOUR false arrest claim against AMERICAN AIRLINES (including the**
21 **scope of each witness’s knowledge).**

22 **Response:** See Plaintiff’s First and Second Supplemental Disclosure Statements, which is
23 hereby incorporated by reference as if fully stated herein. Plaintiff reserves the right to
24 supplement these responses and his disclosure statements as discovery is ongoing and
25 additional information may come to light.
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1 **ROG 20: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
2 **engaged in conduct that “was extreme and outrageous.”**

3 **Response:** Objection. This ROG is again duplicative and seeks information that has
4 already been disclosed. Subject to that objection, See answers to ROG 2-3, 6, 8-10, 12-13,
5 15, See Complaint, Plaintiff’s First Supplemental Disclosure Statement and
6 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
7 BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby
8 incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement
9 these responses and those disclosure statements as discovery is ongoing and additional
10 information may come to light.
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14 **ROG 21: State all facts in support of YOUR allegation that AMERICAN AIRLINES**
15 **intentionally “sought to cause YOU emotional distress.”**

16 **Response:** Objection. This ROG is again duplicative and seeks information that has
17 already been disclosed. Subject to that objection, See answers to ROG 2-3, 6, 8-10, 12-13,
18 15, See Complaint, Plaintiff’s First Supplemental Disclosure Statement and
19 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
20 BENNETT_000109 - POLICE REPORT, BENNETT_000132-147, which are hereby
21 incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement
22 these responses and those disclosure statements as discovery is ongoing and additional
23 information may come to light.
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1 **ROG 22:** State all facts in support of YOUR allegation that AMERICAN AIRLINES
2 “was aware of and disregarded the near certainty that [its] conduct would result in
3 emotional distress.”
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5 **Response:** Objection. This ROG is again duplicative and seeks information that has
6 already been disclosed. Subject to that objection, See answers to ROG 2-3, 6, 8-10, 12-13,
7 15, See Complaint, Plaintiff’s First Supplemental Disclosure Statement and
8 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
9 BENNETT_000109 - POLICE REPORT which are hereby incorporated by reference as if
10 fully stated herein. Plaintiff reserves the right to supplement these responses and those
11 disclosure statements as discovery is ongoing and additional information may come to
12 light.
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16 **ROG 23:** If YOU contend that YOU suffered severe emotional distress as a result of
17 American Airlines, state all facts in support of YOUR contention.
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19 **Response:** Objection. This ROG is again duplicative and seeks information that has
20 already been disclosed. Subject to that objection, See answers to ROG 2-3, 6, 8-10, 12-13,
21 15, See Complaint, Plaintiff’s First Supplemental Disclosure Statement and
22 BENNETT_00015-16, Demand Letter BENNETT_00048-57, and BENNETT_000098-
23 BENNETT_000109 - POLICE REPORT, BENNETT_000132-147 which are hereby
24 incorporated by reference as if fully stated herein. Plaintiff reserves the right to supplement
25 these responses and those disclosure statements as discovery is ongoing and additional
26 information may come to light.
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1 **ROG 24:** If YOU contend the emotional distress YOU suffered as a result of the
2 **INCIDENT was severe, state all facts in support of YOUR contention.**

3 **Response:** Objection. This ROG is again duplicative and seeks information that has
4 already been disclosed. Subject to that objection, Plaintiff was stuck in Alaska tens of miles
5 away from any services during the heart of winter. He was sequestered from his family and
6 friends. His emotional distress caused him to lose significant weight. His bank account
7 decreased by close to \$100,000 while he had to install plumbing to survive the Alaska
8 winter and had to support his family. The stress and depression led to Plaintiff suffering a
9 stroke. See answers to ROG 2-3, 6, 8-10, 12-13, 15, See Complaint, Plaintiff's First
10 Supplemental Disclosure Statement and BENNETT_00015-16, Demand Letter
11 BENNETT_00048-57, and BENNETT_000098-BENNETT_000109 - POLICE REPORT,
12 BENNETT_000119, BENNETT_000132-147 which are hereby incorporated by reference
13 as if fully stated herein.
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16 Subject to these objections, Plaintiff was stuck away from his family for months.
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18 Plaintiff suffers from PTSD and the trauma of this event caused him to enter a deep
19 depression – even contemplating suicide. Plaintiff has served his country more than most
20 individuals could even fathom. He has been issued commendations, purple hearts, the silver
21 star, and more. He has consulted with politicians – including the President. He is a highly
22 respected individual in the military and governmental communities. Being called a criminal
23 and forced to endure humiliation, mental distress, and physical harm because of the vile
24 actions of American Airlines and its employees all fully contributed to Plaintiff's
25 conditions. He is unable to participate in his previous hobbies such as golf and his daily
26 activities have been affected. This experience was overwhelming, caused him to feel
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1 helpless, and has caused a degradation in his familial relationships and friendships. Plaintiff
2 reserves the right to supplement these responses and those disclosure statements as
3 discovery is ongoing and additional information may come to light.
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6 **ROG 25: IDENTIFY all witnesses with personal knowledge of facts YOU contend will**
7 **support YOUR intentional infliction of emotional distress claim against AMERICAN**
8 **AIRLINES (including the scope of each witness's knowledge).**

9 **Response:** See Plaintiff's First and Second Supplemental Disclosure Statements, which are
10 hereby incorporated by reference as if fully stated herein.
11

12 **RESPECTFULLY SUBMITTED** this 6th day of February 2025.
13

14 **MILLS + WOODS LAW, PLLC**

15
16 By /s/ Sean A. Woods
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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025, I electronically transmitted the foregoing document via email to the following:

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*Attorneys for Defendant American Airlines
Group, Inc.*

/s/ Ben Dangerfield

VERIFICATION

I, Sean Bennett, hereby declare, under penalty of perjury, that the foregoing Responses to Interrogatories are true and correct to the best of my knowledge and belief.

EXECUTED on Feb 6, 2025 _____.



Sean Bennett (Feb 6, 2025 14:48 CST)

Sean Bennett